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1 A.	metals during that time period of '83 to '86?	1 Q.	And I was wondering if there was anything in particular about her that makes her more memorable to you than maybe some of your other employees.
2	There was a small amount. Most of it was carried out in the machine shop downstairs and they knew how to handle it, and what they would do is run coolant and there was machining and that. They knew how to do it. But we didn't do it.	2	
3		3	
4		4	
5		5 A.	She's tough. When she was -- like when she transferred to the inspection department, we couldn't get nothing through inspection. She nitpicked everything to death. She was a pain. I had to go to her foreman and tell her, back off. I mean, she just created problems and I went to her foreman and had to tell her to back off so we could get stuff through inspection, stuff that had -- was next to perfect, you know, and she was -- she was tough.
6		6	
7		7	
8 Q.	Okay. So Department 3670 did not work with beryllium metal?	8	
9		9	
10 A.	No; no, not machining or anything like that. The only beryllium metal that we had were beryllium tools because they're nonmagnetic, and when you're working with big magnets, if you use a magnetic tool, you go to tighten a nut or something and the wrench would stick to a magnet, so the nonmagnetic tools were used because they're nonmagnetic. But other than that, that's the only thing we used - beryllium.	10	
11		11	
12		12	
13		13	
14		14	
15		15 Q.	Did you have similar problems with her when you were her supervisor?
16		16	
17		17	
18		18 A.	MR. HONIK: Objection to the form.
19 Q.	So just to clarify that, you might have used some beryllium containing tools in your process, but you didn't --	19	No. When she worked for me, the ARCO windows was like her thing and she did a good job with them and she worked, you know, but she's a very,
20		20	how do I say it, strong woman. She says to her
21		21	husband, "jump," he'll say, "how high." That's
22 A.	Wrenches.	22	all I can say.
23 Q.	Okay, wrenches.	23	

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1 A.	Wrenches.	1	MS. LINDEMANN: Thank you, Mr.
2 Q.	In particular --	2	Broadbent. No more questions.
3 A.	And things like that, but I couldn't think of anything that Suzanne would possibly use them on because she didn't work on that sort of stuff. Most of that was too heavy for women anyway because the magnets weighed a ton.	3	MR. HONIK: Why don't we go off the record just for a minute.
4		4	(Discussion held off the record.)
5		5	FURTHER EXAMINATION
6		6	BY MR. HONIK:
7		7	
8 Q.	Was your department during that time period or any time in the '80's ever involved with the Agis project?	8 Q.	Mr. Broadbent, good afternoon to you. I know this has been a little bit of a long morning and I appreciate --
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10		10	
11 A.	Agis?	11 A.	That's all right. As long as I'm out of here, I don't want to come back.
12 Q.	Agis.	12 Q.	You'll be out of here soon enough.
13 A.	I don't know what the Agis project is.	13 A.	Okay.
14		14 Q.	And I don't anticipate that you'll need to come back, but before I ask you some questions of my own, I want to remind you about a couple things.
15	MR. UBERSAX: Isn't it Egis?	15	First of all, I'm an attorney too.
16	MS. LINDEMANN: Egis. Excuse me. Thank you.	16	My name is Rubin Honik and I represent the Genereuxs.
17 Q.	Egis.	17 A.	Okay.
18 A.	Egis? I still don't know what it is.	18 Q.	And I'm very grateful for your appearance today, I know the rest of the lawyers are, for taking
19 Q.	Okay; good.	19	
20 A.	That was --	20	
21 Q.	Thank you. You seem to have a fairly distinct recollection of Suzanne Genereux.	21	
22		22	
23 A.	Yes.	23	

30 (Pages 114 to 117)

